

UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
SPARTANBURG DIVISION

JANE DOE,

Plaintiff,

vs.

LIMESTONE UNIVERSITY F/K/A
LIMESTONE COLLEGE, COLLINS
MURPHY, MG FREESITES, LTD., d/b/a
PORNHUB.COM, and HAMMY MEDIA,
LTD. d/b/a XHAMSTER.COM,

Defendants.

Case No.: 7:21-cv-03193-JD

**MOTION
IN SUPPORT OF
PRO HAC VICE APPLICATION**

The undersigned local counsel hereby moves, together with the attached Application and Affidavit, that **Valentin D. Gurvits** be admitted *pro hac vice* in the above-captioned case as associate counsel. As local counsel, I understand that:

1. I will personally sign and include my District of South Carolina federal bar attorney identification number on each pleading, motion, discovery procedure, or other document that I serve or file in this court; and
2. All pleadings and other documents that I file in this case will contain my name, firm name, address, and phone number and those of my associate counsel admitted *pro hac vice*; and
3. Service of all pleadings and notices as required shall be sufficient if served upon me, and it is my responsibility to serve my associate counsel admitted *pro hac vice*; and
4. Unless excused by the court, I will be present at all pretrial conferences, hearings, and trials and may attend discovery proceedings. I will be prepared to actively participate if necessary.
5. Certification of Consultation (Local Civil Rule 7.02).

☒ Prior to filing this Motion, I conferred with opposing counsel who has indicated the following position as to this Motion: ☐ will likely oppose; ☒ does not intend to oppose

☐ Prior to filing this Motion, I attempted to confer with opposing counsel but was unable to do so for the following reason(s):

☐ No duty of consultation is required because the opposing party is proceeding pro se.

Metcalf & Atkinson, LLC

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Name of Local Counsel

s/ Hannah Rogers Metcalfe

Signature of Local Counsel

Local Counsel for *Hammy Media, LTD*

District of South Carolina

Federal Bar Number 9943